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FILED

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RICHARD W. WIEKING
CLERK U.S. DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

FOSTER FARMS DAIRY,

Plaintiff,

v.

ALLSTATE INSURANCE COMPANY,
DOES 1 through 50, inclusive,

Defendants.

Case No. C 03-02426 MJJ

STIPULATION AND ~~PROPOSED~~
ORDER RE CONTINUATION OF
DEADLINES SET BY CASE
MANAGEMENT ORDER

The parties, by and through their respective counsel of record, hereby stipulate and agree
as follows and respectfully request that the Court approve and give effect to their stipulation:

WHEREAS, the Court has set the following cut-off dates in this case:

1. Designation of Experts: January 6, 2006;
2. Expert Reports: January 13, 2006;
3. Designation of Supplemental/Rebuttal Experts: January 27, 2006;
4. Supplemental Rebuttal Reports: January 27, 2006;

5. Settlement Conference before Magistrate Chen: February 2, 2006;
6. Expert discovery: February 3, 2006;
7. Dispositive motions: February 28, 2006;
8. Pre-Trial Conference: April 4, 2006;
9. Trial: April 17, 2006;

WHEREAS, the Court extended the discovery cut-off to January 31, 2006 by order of December 7, 2005;

WHEREAS, settlement conference statements are due to be filed by January 19, 2006;

NOW, THEREFORE, the parties respectfully request a sixty-day extension of each of the above dates to allow for discovery to be completed and settlement discussed in a more orderly fashion. Various witnesses have been unavailable for deposition for a variety of reasons. Various discovery disputes have arisen. The parties are seeking to resolve these issues amicably, but cannot do within the parameters of the present schedule.

IT IS HEREBY SO STIPULATED AND AGREED as to the following cut-off dates:

1. Discovery Cut-Off: March 3, 2006;
2. Designation of Experts: March 7, 2006;
3. Settlement Conference Statements: March 13, 2006;
4. Settlement Conference: March 20, 2006;
5. Expert Reports: March 21, 2006;
6. Designation of Supplemental/Rebuttal Experts: April 4, 2006;
7. Supplemental Rebuttal Reports: April 4, 2006;
8. Expert discovery: April 11, 2006;
9. Dispositive motions: April 29 2006;
10. Pre-Trial Conference: June ⁶ 2, 2006;
11. Trial: June 19, 2006.

Respectfully submitted,

Dated: December 22, 2005

STANZLER FUNDERBURK & CASTELLON LLP

By: Jordan S. Stanzler

Jordan S. Stanzler, Esq.

Attorneys for Plaintiff
FOSTER FARMS DAIRY

Dated: December 22, 2005

SONNENSCHN NATH & ROSENTHAL LLP

By: [Signature]

Attorneys for Defendant
ALLSTATE INSURANCE COMPANY

IT IS SO ORDERED:

[Signature]
United States District Court Judge